

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RONALD BIANCHI, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

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:
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: Civil Action No. 17-cv-1263 (CCC) (MF)
:
: Motion Return Date: May 21, 2018
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: Oral Argument Requested
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**DECLARATION OF PHILIP M. OLISS IN SUPPORT OF
DEFENDANT SAMSUNG ELECTRONICS AMERICA, INC.'S
MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED CLASS ACTION
COMPLAINT**

**TOMPKINS, MCGUIRE, WACHENFELD
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Attorneys for Defendant SAMSUNG
ELECTRONICS AMERICA, INC.

I, PHILIP M. OLISS, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney duly admitted to practice law in the States of Ohio and Illinois and a partner with the law firm of Squire Patton Boggs (US) LLP, with offices located in Cleveland Ohio.

2. I represent Defendant Samsung Electronics America, Inc. (“SEA”) in the above-captioned matter. I am admitted *pro hac vice* in this Court.

3. I make the following statements in connection with SEA’s Motion to Dismiss Plaintiffs’ First Amended Class Action Complaint, which Motion is being filed contemporaneously with the instant Declaration.

4. Attached hereto as Exhibit A is a true and correct copy of the Limited Warranty for Samsung Refrigerator Model No. RF23HCEDBWW/AA (“RF23HC”), as excerpted from the RF23HC’s User Manual.

5. Attached hereto as Exhibit B is a true and correct copy of the Limited Warranty for Samsung Refrigerator Model No. RF30HBEDBSR/AA (“RF30”), as excerpted from the RF30’s User Manual.

6. Attached hereto as Exhibit C is a true and correct copy of the Limited Warranty for Samsung Refrigerator Model No. RF28HFEDBSR/AA (“RF28”), as excerpted from the RF28’s User Manual.

7. Attached hereto as Exhibit D is a true and correct copy of the Limited Warranty for Samsung Refrigerator Model No. RF23HSESBSR/AA (“RF23HS”), as excerpted from the RF28HS’s User Manual.

8. Attached hereto as Exhibit E is a true and correct copy of the Limited Warranty for Samsung Refrigerator Model No. RF263BEAESR (“RF263”), as excerpted from the RF263’s User Manual.

9. Attached hereto as Exhibit F is a true and correct copy of the Limited Warranty for

Samsung Refrigerator Model No. RF23HTEDBSR/AA (“RF23HT”), as excerpted from the RF28HT’s User Manual.

10. Attached hereto as Exhibit G is a true and correct copy of Samsung Service Bulletin No. ASC20140818002 (Aug. 18, 2014) (“TSB 2014”).

11. Attached hereto as Exhibit H is a true and correct copy of Samsung Service Bulletin No. ASC20150717001 (July 17, 2015) (“TSB 2015”).

12. Attached hereto as Exhibit I is a true and correct copy of a June 21, 2017 letter from Plaintiffs’ Counsel to SEA, bearing SEA’s time stamp showing receipt on June 26, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 24, 2018



PHILIP M. OLISS